

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No: 18-CR-10391
	)	
DEREK G. SHEEHAN,	)	
Defendant.	)	

**ASSENTED-TO MOTION FOR LEAVE TO FILE**

Now comes the United States, by and through the undersigned Assistant United States Attorney, and respectfully requests that this Court:

1. Allow the government to file exhibits under seal. As reason therefor, the government submits that the exhibits are search warrant affidavits that remain sealed. :
2. Allow the government to file a response in excess of 20 pages, pursuant to Local Rule 7.1(b)(4). As reason therefor, the government submits that, in the interest of efficiency, it has submitted one Omnibus Response to the two motions filed by the defendant rather than answer them individually. Defendant's motion to suppress was 31 pages in length and his motion for a Franks hearing was 11 pages in length. The government has prepared an Omnibus Response to the Defendant's Motions that is 26 pages in length, which amount was necessary to adequately address the arguments set forth by the defendant in both of his motions.
3. Allow the government to file its Omnibus Response one day past the filing deadline, which was most recently set for July 23, 2019. As reason therefor, the government submits that, in addition to preparing for a hearing on a Motion to Suppress and a Rule 11 hearing, both scheduled for July 23, 2019, the government was unexpectedly required to address a motion filed late by a defendant in an unrelated matter on that same day.

The government has conferred with counsel for the defendant, who assents to all of the requests articulated herein.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Anne Paruti  
Anne Paruti  
Assistant United States Attorney

Date: July 24, 2019

**CERTIFICATE OF SERVICE**

I, Anne Paruti, hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti  
Assistant U.S. Attorney

Dated: July 24, 2019